

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:
SEARS HOLDINGS CORPORATION, et al¹,
Debtor.

Chapter 11
Case No. 18-23538-RDD
(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES
AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that M&G Jewelers, Inc. (“M&G”), creditor and party-in-interest in the above-referenced matters (the “Cases”), by and through its counsel, Bell Nunnally & Martin LLP, files this Notice of Appearance and Request for Notices and Service of Papers for its counsel of record in the above entitled and numbered bankruptcy proceeding, pursuant to section 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), and Rules 2002, 3017(a), 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and respectfully requests that all notices given or required to be given

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

in these cases, and all papers served or required to be served in these Cases be given to and served upon the following:

Russell W. Mills
R. Kent Love
Bell Nunnally & Martin LLP
2323 Ross Avenue, Suite 1900
Dallas, Texas 75201
214.740.1400 (Telephone)
214.740.1499 (Facsimile)
rmills@bellnunnally.com (E-mail)
klove@bellnunnally.com (E-mail)

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, whether transmitted or conveyed by regular mail, electronic mail, delivery service or some other means, or otherwise filed or made with regard to these Cases and proceedings therein. Further, this request includes copies of any disclosure statements to be submitted prior to approval and any and all plans of reorganization.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance nor any later appearance, pleading, claim, or suit shall be deemed to waive any substantive rights of M&G, including, without limitation, the right (1) to have final orders in non-core matters entered only after *de novo* review by a district court judge, (2) to trial by jury in any proceedings so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the United States District Court for the Southern District of New York withdraw the reference in any matter subject to mandatory or discretionary withdrawal or the right to seek abstention in favor of any state court or (4) to assert other rights, claims, actions, defenses, setoffs, or recoupments to which M&G is or

may be entitled to under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. Nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules of Federal Rules of Civil Procedure.

Dated: October 25, 2018

Respectfully submitted,

BELL NUNNALLY & MARTIN, LLP

/s/ Russell W. Mills
Russell W. Mills
Texas State Bar No. 00784609
R. Kent Love
Texas State Bar No. 24102114

2323 Ross Avenue, Suite 1900
Dallas, Texas 75201
214.740.1400 (Telephone)
214.740.1499 (Facsimile)
rmills@bellnunnally.com (E-mail)
klove@bellnunnally.com (E-mail)

**ATTORNEYS FOR
M&G JEWELERS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Notice of Appearance and Request for Notices was electronically filed on this 25th day of October 2018, and served *via CM/ECF* on all parties requesting electronic notification in this case.

/s/ Russell W. Mills
Russell W. Mills